

In the Matter of)
) WC Docket No.04-36
IP-Enabled Services)

Public Comments from:)
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911 Communications)
)
Spokane County, Wa.)
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May 7, 2004)

Spokane County 911 Communications, located in Washington State is appreciative of the opportunity to comment on proposed rulemaking for IP-enabled services. The comments submitted are not technical in nature, but rather address impacts to the PSAP and public access to 911 using IP-Enabled technology.

As VOIP moves into mainstream usage, i.e. residential customers, there will be a need to ensure that the 911 networks of today evolve with IP- Enabled technology. Currently there is not a funding mechanism in place for wholesale 911 network changes.

There will also be significant impacts to the ability to fund 911 services/PSAP operations as the specific tax revenues received from wireline and wireless phones will likely decrease. Beginning in 1981, the general electorate and legislature (RCW 82.14B.030) approved County level taxation on wireless and wireline. In Spokane County, this revenue is the sole source of support for 911 service and any technological improvements. Spokane County 911 feels that there must be a regulated mechanism in place to fund 911 networks and PSAP operations.

The public in Washington State has come to expect and rely upon Enhanced 911 service when calling 911. The Washington State legislature has codified the following findings regarding the provision of Enhanced 911:

RCW 38.52.500

Statewide enhanced 911 service-- Finding.

The legislature finds that a statewide emergency communications network of enhanced 911 telephone service, which allows an immediate display of a caller's identification and location, would serve to further the safety, health, and welfare of the state's citizens, and would save lives. The legislature, after reviewing the study outlined in section 1, chapter 260, Laws of 1990, further finds that statewide implementation of enhanced 911 telephone service is feasible and should be accomplished as soon as practicable.

[1991 c 54 § 1.]

RCW 38.52.501

Statewide enhanced 911 service -- Findings.

The legislature finds that statewide enhanced 911 has proven to be a lifesaving service and that routing a 911 call to the appropriate public safety answering point with a display of the caller's

identification and location should be available for all users of telecommunications services, regardless of the technology used to make and transmit the 911 call. The legislature also finds that it is in the best public interest to ensure that there is adequate ongoing funding to support enhanced 911 service.

[2002 c 341 § 1.]

RCW 38.52.505

Findings -- 1999 c 24: "The legislature finds that the citizens of the state increasingly rely on the dependability of enhanced 911, a system that allows the person answering an emergency call to determine the location of the emergency immediately without the caller needing to speak. The legislature further finds that the degree of accuracy of the displayed information must be adequate to permit rapid location of the caller while taking into consideration variables specific to local conditions. The legislature further finds that it is appropriate that rules permitting local fire agencies to evaluate and approve the accuracy of location information relating to their service areas be adopted." [1999 c 24 § 1.]

911 service in the form of Enhanced 911 has been assessed to be a requisite level of service in Washington State and Spokane County. The legislature (via referendum) mandated all counties in the State provide Enhanced 911 service by December 31, 1998 (RCW 38.52.510), so that Enhanced 911 was available on a statewide basis to all citizens.

We must ensure the same level of service is available to subscribers of VOIP as a primary telecommunications method. Currently the same level of service is not available to VOIP subscribers and will require technology enhancements to attain an Enhanced 911 level of service. VOIP callers are not provided with 911 as three digit dialing, but rather a 10-digit emergency number connecting to a PSAP. This method of accessing the PSAP does not provide Enhanced 911 information; callers will have to be able to tell the call receiver where to send help and what their call back number is. 10-digit access to PSAPs also does not ensure appropriate call routing. For example, one vendor has stated they will use wireless boundaries as the basis for directing calls. Spokane County feels this is unacceptable as there will be specific subscriber addresses, which should be used by the vendor for call routing. Intrinsically, the initial VOIP service to access emergency services will impact PSAP workload by requiring more lengthy interviewing in order to provide assistance, no call-back number and re-routing misrouted calls.

Spokane County 911 feels that universal access to emergency services should require regulation, both to ensure we maintain a level of service that the public and legislative bodies have come to expect and that funding mechanisms are in place for appropriate 911 networks and PSAP operations.

Spokane County 911 encourages rules that set the stage for true Enhanced 911 service with universal access regardless of source (VOIP, wireline, wireless) and that support funding mechanisms for PSAP operations.

Having submitted the previous comments, we must conclude with a statement assuring the FCC and the public that Spokane County 911 remains committed to universal access to emergency services via 911 and will be actively involved in promulgation of technical solutions with VOIP providers. We will also remain actively

involved in ensuring stable revenue streams are in place for 911 network and PSAP operations.